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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

9 UNITED STATES OF AMERICA,)
10)
11) Plaintiff,) No. CR 07-0747 SI
12)
13) v.) [PROPOSED] STIPULATED ORDER
14) CONTINUING STATUS
15) APPEARANCE
16)
17) CHRISTOPHER REYNOLDS,)
18)
19) Defendant.)
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Proposed Hearing Date: Friday, July 18, 2008 at 11:00 a.m.

16 The defendant Christopher Reynolds is charged with bank robbery in the above-captioned
17 matter. Also before this Court are allegations of violations of his term of supervised release.

18 Mr. Reynolds also is charged in the Western District of New York with a separate bank
19 robbery. In this proposed stipulated continuance, the parties represent that they are seeking a global
20 resolution with a proposed disposition for both bank robbery allegations, as well as the supervised
21 release allegations.

22 Mr. Reynolds's counsel, AFD Kalar, has written the AUSA assigned to the matter in New
23 York with a proposed disposition and met with Northern District AUSA Sambat. Mr. Sambat has
24 spoken with his counterpart in New York, and understands that there are several issues that will
25 require further discussion before a disposition is finalized. The parties are currently scheduled to
26 return before the magistrate on July 8, 2008. The parties hope to then have an arraignment on

1 charging documents from both federal districts, and a full advisement of the current Form 12
2 allegations. It is the intention of the parties to next appear before this Court for pleas of guilt to
3 charges in both districts, as well as admission of the Form 12 allegations.

4 Mr. Reynolds is currently scheduled to appear before this Court for status on Friday June 6,
5 2008, on the Form 12 allegations. In light of the parties' attempt to arrive at a global disposition, that
6 date will be premature. The defense has accordingly requested that the matter be continued to
7 Friday, July 18, 2008 at 11:00 am for change of plea or status. The government has no objection to
8 this request.

9 Therefore, for good cause shown the status appearance on Friday, June 6, 2008 is vacated. The
10 matter shall be added to the Court's calendar on Friday, July 18, 2008 for status or change of plea.

11 The Court finds that time should be excluded under the Speedy Trial Act from Friday, June 6,
12 2008 through Friday, July 18, 2008. In this stipulated order, Mr. Kalar represents that he will be out
13 of the district for two weeks during that period. In addition, Mr. Kalar represents that this case is
14 complex, given the need for multi-district negotiations and for the production of additional discovery
15 from the New York federal district. Finally, the defense seeks this time to permit for its effective
16 preparation on two separate federal bank robbery allegations, as well as supervised release
17 violations. Therefore, the need for continuity of counsel, the complexity of the case, and the need for
18 effective preparation of counsel each outweigh the defendant's and the public's right to a Speedy
19 Trial, and the Court finds that each of these bases merit exclusion of time under the Speedy Trial
20 Act.

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1 The parties are directed to provide any written plea agreement to the Court well in advance of
2 the July 18th appearance, for its consideration before the plea.

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4 IT IS SO ORDERED.

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6 _____
7 Dated

SUSAN ILLSTON
United States District Court Judge

8 IT IS SO STIPULATED.

9
10 _____
11 DATED

/s/
JOSEPH RUSSONIELLO
United States Attorney
Northern District of California
ALBERT B. SAMBAT
Special Assistant United States Attorney

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14 _____
15 DATED

/s/
BARRY J. PORTMAN
Federal Public Defender
Northern District of California
STEVEN G. KALAR
Assistant Federal Public Defender